



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*86 Chambers Street  
New York, New York 10007*

March 21, 2022

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
40 Foley Square  
New York, NY 10007

Re: *ACLU v. FBI*, 21 Civ. 10719 (RA)

Dear Judge Abrams:

In accordance with the Court's January 24, 2022 Order, ECF No. 12, we write jointly on behalf of Defendant the Federal Bureau of Investigation ("FBI") and Plaintiff the American Civil Liberties Union ("ACLU") to update the Court on the status of the parties' discussions on a schedule for the search, processing, and production of responsive records in the instant matter.

The FBI has completed its search for documents potentially responsive to Plaintiff's Freedom of Information Act ("FOIA") request. The FBI intends to begin reviewing documents shortly at a rate of approximately 500 pages per month, and will produce any responsive, non-exempt documents, or portions thereof, on a rolling basis. The FBI anticipates making its first production by May 31, 2022. At this time, the FBI does not yet have a page count of potentially responsive records, but anticipates providing one to ACLU by April 30, 2022.

Plaintiff has advised that its position on the reasonableness of the proposed processing rate will depend on the total volume of pages to be processed. Thus, at this time the parties have not yet reached agreement on a production schedule but will endeavor to do so.

The parties are available to appear at the initial conference on March 25, 2022, as scheduled. Alternatively, if the Court prefers, the parties can provide a further update on the status of their discussions within 30 days, or once they have reached agreement, whichever date is earlier.

Respectfully submitted,

DAMIAN WILLIAMS  
Acting United States Attorney

By: /s/ Dominika Tarczynska  
DOMINIKA TARCZYNSKA  
Assistant United States Attorney

Tel. (212) 637-2748  
Fax (212) 637-2686  
dominika.tarczynska@usdoj.gov  
*Attorney for Defendant*

And

/s/ Nathan Freed Wessler  
Nathan Freed Wessler  
Laura Moraff\*  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
(212) 549-2500  
nwessler@aclu.org

Robert Hodgson  
Daphna Spivack  
New York Civil Liberties Union Foundation  
125 Broad Street, 19th Floor  
New York, NY 10004  
(212) 607-3300  
rhodgson@nyclu.org

*Counsel for Plaintiff*

\* Application for SDNY admission  
forthcoming